

**REMARKS/ARGUMENTS**

Prior to the entry of this amendment, claims 1-47 were pending in this application. Claims 15-18, 26, 27, 35, and 44 are amended herein. No claims are added and claims 1-14, 29-34, and 40-43 are canceled. Therefore, claims 15-28, 35-39, and 44-47 remain pending in the application. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

**Provisional Obviousness-type Rejection**

The Office Action has provisionally rejected Claims 1-47 under the doctrine of obviousness-type double patenting as unpatentable over claims 1-34 of copending U.S. Patent Application Serial No. 09/999,177, filed November 30, 2001. Applicants respectfully submit that amendments made herein render this rejection mute. Specifically, U.S. Patent Application Serial No. 09/999,177 does not claim determining dynamic members of a first group based on a rule that defines dynamic membership for said first group, wherein said rule is stored in a dynamic rule attribute of an identity profile of said first group. Alternatively, the undersigned is prepared to submit a Terminal Disclaimer in compliance with 37 CFR 1.321(c) if the claims are otherwise found to be allowable.

**35 U.S.C. § 102 Rejection, Hayes**

The Office Action has rejected claims 1-47 under 35 U.S.C. § 102(e) as being anticipated by U. S. Patent No. 6,105,066 of Hayes, Jr. (hereinafter "Hayes"). The Applicant respectfully submits the following arguments pointing out significant differences between claims 15-28, 35-39, and 44-47 submitted by the Applicant and Hayes.

Hayes "provides a common repository for configuration information for users and applets in a client-server environment." (Col. 4, lines 11-13) The system of Hayes "allows users

to roam, that is, to log-in from any computer in the system at any time and have it configured automatically at run time according to the preferences stored for the user at the server." (Col. 4, lines 14-17) Under Hayes, "the server stores a plurality of object-oriented end user applications for downloading to user stations and it further stores configuration preferences for the end user applications in the context of different groups and users." (Col. 4, lines 35-38) The "user and group preferences are stored as a tree hierarchy." (Col. 8, line 39) "All users belong to the AllUsers group; this group contains the default preferences for some or all user applets on the server." (Col. 8, lines 41-43) "If a user is a member of more than one group (another group in addition to AllUsers), then the groups are prioritized for the purpose of selecting the preferences for a given applet for that user." (Col. 8, lines 64-67) "When a user requests to run an applet the preferences are coalesced according to the group or groups to which the user belongs and the user applet is configured on the user desktop accordingly." (Col. 9, lines 7-11)

However, Hayes does not disclose determining dynamic members of a group based on a rule that defines dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group. Rather, the memberships of Hayes are all static, i.e., explicitly defined by the administrator (col. 7, lines 13-19, col. 17, lines 55-56, col. 18, lines 29-34, col. 19, line 63-66, col. 20, lines 40-45) rather than determined based on a rule. Hayes does disclose a blanket policy of requiring all users to be members of the "AllUsers" group. However, such a blanket policy is no different than any other explicit definition of a user's group memberships. That is, this policy defines a static rather than a dynamic membership and cannot be reasonably interpreted as disclosing determining dynamic members of a group based on a rule that defines dynamic membership for that group. Furthermore, Hayes does not disclose such a rule being stored in a dynamic rule attribute of an identity profile of the group

Claim 15, upon which claims 16-28 depend, claim 35, upon which claims 36-39 depend, and claim 44, upon which claims 45-47 depend, each recite in part "determining dynamic members of a first group based on a rule that defines dynamic membership for said first group, wherein said rule is stored in a dynamic rule attribute of an identity profile of said first

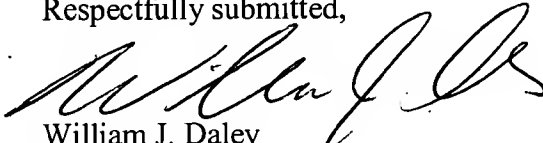
group." Hayes does not disclose "determining dynamic members of a first group based on a rule that defines dynamic membership for said first group, wherein said rule is stored in a dynamic rule attribute of an identity profile of said first group." Rather, Hayes the memberships of Hayes are all explicitly defined (i.e., static). For at least these reasons, claims 15-28, 35-39, and 44-47 should be allowed.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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